

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ADRIAN McCRAY,

Plaintiff

v.

H&R BLOCK EASTERN ENTERPRISES,
INC. and LINDA MURPHY,

Defendants

Civil Action No. 04-CV12232-PBS

**JOINT MOTION FOR 14 DAY
EXTENSION OF DISCOVERY DEADLINE**

The parties to the above-captioned case respectfully request a 14-day extension of the Discovery Deadline pursuant to the Order of this Court on August 17, 2005 allowing the parties Joint Motion for 30 Day Extension of Discovery Period dated August 16, 2005 ("Discovery Order"). As grounds for this motion the parties state:

1. The parties are seeking an extension of only the Fact Discovery Deadline which is now set for October 14, 2005. The parties are asking that the Fact Discovery Deadline be extended for 14 days or until October 28, 2005.

2. The parties attempted to schedule the completion of plaintiff's deposition for the end of September. As a result of plaintiff's unavailability, due to a several week out-of country trip previously scheduled, and conflicts in the schedules of counsel for both plaintiff and defendants, the completion of Mr. McCray's deposition had to be scheduled for Friday, October 21, 2005.

3. This is not a request for an extension of any of the Summary Judgment dates allowed by the Discovery Order of August 17, 2005 or the Summary Judgment/Pretrial Conference scheduled for December 13, 2005.

4. The allowance of this brief extension requested by this motion will not unduly interfere with or delay the timely disposition of this case.

WHEREFORE, the parties request that this Court extend the date of the Fact Discovery Deadline allowed by this Court from October 14 to October 28, 2005.

ADRIAN McCRAY

H&R BLOCK EASTERN ENTERPRISES, INC.
and LINDA MURPHY

By his attorney,

/s/ Paul A. Manoff

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By their attorneys,

/s/ Adrienne M. Markham

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Dated: October 6, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by [signature] on October 6, 2005